

GWACS Armory, LLC vs KE Arms, LLC
Iain Harrison

June 1, 2022

20-CV-0341-CVE-SH

IN THE UNITED STATES COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

GWACS ARMORY, LLC, an Oklahoma
limited liability company,

Plaintiff,

v.

KE ARMS, LLC, RUSSEL PHAGAN,
SINISTRAL SHOOTING TECHNOLOGIES,
LLC, BROWNELLS, INC. And SHAWN
NEALON,

Defendants,

and

KE ARMS, LLC,

Plaintiff,

v.

GWACS ARMORY, LLC, GWACS DEFENSE
INCORPORATED, JUD GUDGEL, RUSSEL
ANDERSON, DOES I through X, and
ROE CORPORATIONS I through X,

Defendants.

Case No.
20-CV-0341-CVE-SH

Consolidated with
Case No.
21-CV-0107-CVE-SH

DEPOSITION OF IAIN HARRISON

PHOENIX, ARIZONA
June 1, 2022

Prepared by:
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Certified Reporter
Certification No. 50464

**CERTIFIED
TRANSCRIPT**

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09:29:06 1 Q. And how did you become aware yesterday that a
09:29:09 2 subpoena was sent to Tool & Design Group back in November
09:29:11 3 of 2021?

09:29:13 4 MR. CALAWAY: You can answer.

09:29:15 5 He's looking at me because I told him, as
09:29:19 6 his counsel, and it is privileged.

09:29:20 7 But you can answer if you want.

09:29:22 8 THE WITNESS: Counsel told me.

09:29:23 9 BY MR. BOGAN:

09:29:26 10 Q. Mike Kenney didn't tell you that there was a
09:29:28 11 subpoena issued to Tool & Design Group last year?

09:29:30 12 A. I understood there was many subpoenas flying back
09:29:38 13 and forth during the course of the last couple of years.
09:29:41 14 Whether or not that was that fact, I have no idea.

09:29:46 15 Q. When did you learn of this lawsuit?

09:29:48 16 A. I couldn't say for sure. I couldn't say
09:29:57 17 specifically.

09:29:58 18 Q. Can you give me an approximation, a range?

09:30:01 19 MR. CALAWAY: Object to the form, asked and
09:30:04 20 answered.

09:30:04 21 THE WITNESS: A range of somewhere in 2021,
09:30:12 22 perhaps.

09:30:13 23 BY MR. BOGAN:

09:30:13 24 Q. Sometime in 2021 you learned that there was a
09:30:18 25 lawsuit between KE Arms and GWACS Armory?

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09:30:23 1 MR. CALAWAY: Object to the form.

09:30:24 2 THE WITNESS: Yeah.

09:30:24 3 BY MR. BOGAN:

09:30:25 4 Q. What were you told about that lawsuit?

09:30:27 5 A. Simply that there was a lawsuit; no specifics.

09:30:31 6 Q. Who told you about it?

09:30:33 7 A. I believe it was Russell Phagan.

09:30:40 8 Q. And so Russell Phagan told you that there was a

09:30:43 9 lawsuit relating to the KP-15 and that's all he told you?

09:30:46 10 A. That's all the details that I can recall.

09:30:49 11 Q. Did he tell you that it related to the CAV-15?

09:30:52 12 MR. CALAWAY: Object to the form.

09:30:53 13 THE WITNESS: Again, I don't recall.

09:30:54 14 BY MR. BOGAN:

09:31:01 15 Q. And prior -- When did Tool & Design Group

09:31:05 16 retain -- Let me back up. Strike that.

09:31:08 17 Who is Tool & Design Group's counsel?

09:31:11 18 A. Could we get a --

09:31:11 19 Q. What is that?

09:31:15 20 MR. CALAWAY: For the record, Alex Calaway

09:31:19 21 is name. We met yesterday.

09:31:23 22 THE WITNESS: There you go.

09:31:24 23 BY MR. BOGAN:

09:31:25 24 Q. When did Tool & Design Group retain Mr. Calaway?

09:31:28 25 A. Perhaps Mr. Calaway can answer that question.